

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

COMES NOW, Movant Wells Fargo Auto Finance, Inc. (hereinafter "Movant") and for its Objection to the Confirmation of Debtor's Chapter 13 Plan states as follows:

1. Movant is the holder of a Promissory Note and Security Agreement dated March 22, 2006 which is secured by the Debtor's motor vehicle described as a 2006 Chevrolet Cobalt, VIN #1G1AL15F667649678.
2. Debtor's Plan lists the fair market value of the 2006 Chevrolet Cobalt at \$6,150.00.
3. The N.A.D.A. book for Central States lists the retail value of the Debtors' 2006 Chevrolet Cobalt at \$8,450.00, a copy of which is attached hereto and incorporated herein as if more fully set forth, and marked as Exhibit 1.

WHEREFORE, Wells Fargo prays for an Order of this Court denying the Confirmation of Debtor's Chapter 13 Plan or, in the alternative, an Order requiring the Debtor to amend his plan

to increase the monthly payments to adequately protect Movant; and to reflect the value of Movant's secured claim on the 2006 Chevrolet Cobalt to be \$8,450.00.

DUNN & MILLER, P.C.

By: /S/ John P. Miller

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CERTIFICATE OF SERVICE

A copy of the foregoing Objection to Debtor's Chapter 13 Plan was served via U.S. mail this 22nd day of February, 2011 by first-class mail, postage prepaid to the following parties not served electronically:

Matthew J. Miller
411 Evergreen
St. Charles, MO 63301
DEBTOR

The following parties will be served electronically:

Douglas M. Heagler 6302 N. Rosebury, Ste. 1W Clayton, MO 63015 DEBTOR'S ATTORNEY	John V. LaBarge, Jr. P.O. 430908 St. Louis, MO 63143 CHAPTER 13 TRUSTEE	Office of U.S. Trustee 111 South Tenth St., Ste. 6353 St. Louis, MO 63102
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/S/ John P. Miller

John P. Miller

Period:	2010	December
Region:	Central	
VIN:	1G1AL15F667649678	Dec2011
Reference #:		
Year:	2006	
Make:	CHEVROLET	
Series:	Cobalt-L4	
Body:	Coupe 2D LT	
Mileage:	67,500	Adjustment: \$0
MSRP:	\$16,200	Weight: 2,742

- Aluminum/Alloy Wheels
- Cruise Control
- Leather Seats
- Pioneer Stereo
- Power Door Locks
- Power Sunroof
- W/out Auto. Trans.

[Current Values](#) [Historical Values](#) [Auction Values](#)

	Rough Trade-In	Average Trade-In	Clean Trade-In	Clean Loan	Clean Retail
Base:	\$4,575	\$5,475	\$6,200	\$5,600	\$8,450
Mileage Adjustment:	\$0	\$0	\$0	\$0	\$0
Options Adjustment:	\$0	\$0	\$0	\$0	\$0
Adjusted Value:	\$4,575	\$5,475	\$6,200	\$5,600	\$8,450

Auction Values

Date Range:

	Low Auction	Average Auction	High Auction
Adjusted Value*:	\$0.00	\$0.00	\$0.00

* NADA Auction Values are only available for the most current data period: (February 2011)

NADA Auction Values are weekly wholesale valuations that directly represent current auction market transactions through auction data analysis. [For more detailed information click here](#)